

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

GREG ABBOTT, *et al.*,

Defendants.

**JOINT MOTION FOR THIRD EXTENSION OF BRIEFING SCHEDULE REGARDING  
APPELLATE ATTORNEYS' FEES**

On November 16, 2021, the Court granted the parties' first joint motion requesting an extension of the briefing schedule relating to Private Plaintiffs' request for appellate attorneys' fees—Private Plaintiffs' Motion for Appellate Attorneys' Fees due December 10, 2021, Defendants' Response due January 7, 2021, and Private Plaintiffs' Reply due January 28, 2022. *See* Briefing Order (Doc. 1244).

Since the entry of that Order, the parties requested a second extension of the briefing schedule by four weeks, to account for the holiday season and the parties' continued good faith negotiations as to the fee award. On December 9, 2021, the Court granted the parties' request, setting an amended briefing schedule: Private Plaintiffs' Motion for Appellate Attorneys' Fees due January 7, 2021, Defendants' Response due February 4, 2022, and Private Plaintiffs' Reply due February 25, 2022. *See* Briefing Order (Doc. 1250).

Over the past month, the parties have continued to work diligently to negotiate a resolution. To that end, the parties, in good faith, have agreed in principle as to the amount of the appellate

fee award, subject to memorialization of that agreement. The parties, therefore, request a further two-week extension of the time to file their attorneys' fees application:

Private Plaintiffs' Motion for Appellate Attorneys' Fees: Due January 21, 2022

Defendants' Response: Due February 18, 2022

Private Plaintiffs' Reply: Due March 11, 2022

Date: January 7, 2022

Respectfully submitted,

/s/ Lindsey B. Cohan

JON M. GREENBAUM  
EZRA D. ROSENBERG  
BRENDAN B. DOWNES  
Lawyers' Committee for  
Civil Rights Under Law  
1500 K Street, N.W., Suite 900  
Washington, D.C. 20005

WENDY WEISER

The Brennan Center for Justice at NYU Law School  
120 Broadway, Suite 1750  
New York, New York 10271

SIDNEY S. ROSDEITCHER

Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019-6064

LINDSEY B. COHAN

Dechert LLP  
515 Congress Avenue, Suite 1400  
Austin, Texas 78701

NEIL STEINER

DECHERT LLP  
1095 Avenue of the Americas  
New York, New York 10036-6797

JOSE GARZA  
Law Office of Jose Garza  
7414 Robin Rest Drive  
San Antonio, Texas 98209

DANIEL GAVIN COVICH  
Covich Law Firm LLC  
802 N Carancahua, Ste 2100  
Corpus Christi, Texas 78401

GARY BLEDSOE  
Potter Bledsoe, LLP  
316 W. 12th Street, Suite 307  
Austin, Texas 78701

VICTOR GOODE  
NAACP  
4805 Mt. Hope Drive  
Baltimore, Maryland 21215

ROBERT NOTZON  
The Law Office of Robert Notzon  
1502 West Avenue  
Austin, Texas 78701

*Counsel for the Texas State Conference of NAACP  
Branches and the Mexican American Legislative  
Caucus of the Texas House of Representatives*

/s/ Leah Aden \_\_\_\_\_  
SHERRILYN IFILL  
JANAI NELSON  
LEAH C. ADEN  
DEUEL ROSS  
NAACP Legal Defense and Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, NY 10006

JONATHAN PAIKIN  
KELLY P. DUNBAR  
TANIA FARANSSO  
Wilmer Cutler Pickering Hale and Dorr LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006

*Counsel for Imani Clark*

/s/ Chad W. Dunn \_\_\_\_\_

CHAD W. DUNN  
K. SCOTT BRAZIL  
BRAZIL & DUNN  
4407 Bee Caves Road  
Building 1, Suite 111  
Austin, TX 78746

J. GERALD HEBERT  
DANIELLE M. LANG  
Campaign Legal Center  
1101 14th St. NW, Suite 400  
Washington, DC 20005

ARMAND G. DERFNER  
Derfner & Altman  
575 King Street, Suite B  
Charleston, SC 29403

NEIL G. BARON  
Law Office of Neil G. Baron  
914 FM 517 W, Suite 242  
Dickinson, Texas 77539

DAVID RICHARDS  
Richards, Rodriguez & Skeith, LLP  
816 Congress Avenue, Suite 1200  
Austin, Texas 78701

*Counsel for Veasey/LULAC Plaintiffs*

LUIS ROBERTO VERA, JR.  
Law Office of Luis Roberto Vera Jr.  
111 Soledad, Ste 1325  
San Antonio, TX 78205

*Counsel for LULAC*

/s/ Rolando L. Rios \_\_\_\_\_

ROLANDO L. RIOS  
115 E. Travis, Suite 1645  
San Antonio, Texas 78205

*Counsel for the Texas Association of Hispanic  
County Judges and County Commissioners*

/s/ Robert W. Doggett  
ROBERT W. DOGGETT  
Texas RioGrande Legal Aid  
4920 N. IH-35  
Austin, Texas 78751

JOSE GARZA  
SUSAN ZINN  
Texas RioGrande Legal Aid  
1111 N. Main Ave.  
San Antonio, Texas 78212

*Counsel for Lenard Taylor, Eulalio Mendez Jr.,  
Lionel Estrada, Estela Garcia Espinoza, Margarito  
Martinez Lara, Maximina Martinez Lara, and La  
Union Del Pueblo Entero, Inc.*

AND

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Attorney General for Civil Litigation

THOMAS A. ALBRIGHT  
Chief for General Litigation Division

/s/ Christopher D. Hilton  
CHRISTOPHER D. HILTON  
Attorney-in-Charge  
Texas Bar No. 24087727  
Deputy Division Chief  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548

*Counsel for State Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Lindsey B. Cohan

Lindsey B. Cohan

Dechert LLP

515 Congress Avenue, Suite 1400

Austin, Texas 78701

[lindsey.cohan@dechert.com](mailto:lindsey.cohan@dechert.com)